

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN
MADISON DIVISION**

Brian Heckel, Individually and as Special
Administrator for the Purposes of This Lawsuit
on Behalf of Sharon Heckel, Deceased,

Plaintiffs,

v.

3M Company, et al.,

Defendants.

Case No. 13-cv-459

Notice of Service of Plaintiff's Expert Witness Disclosures and Reports

TAKE NOTICE that on January 30, 2015, Plaintiff's counsel served Plaintiff's Expert Witness Disclosures and Reports via email ¹ to all counsel of record outlined on the attached Plaintiff's Statement of Expert Witness Disclosures and Reports.

Dated: January 30, 2015

Respectfully submitted,

/s/ Robert G. McCoy

Robert G. McCoy
Attorney for Plaintiff
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¹Reports and Disclosures served using the web-based file transfer service Hightail (f/k/a YouSendIt.)

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Plaintiff's Statement of Expert Witness Disclosures and Reports

Plaintiff identifies the following expert witnesses. Their reports and Rule 26(a)(2)(B) disclosures have been served to counsel of record via email on January 30, 2015. Plaintiff reserves the right to submit additional reports in rebuttal or for other good cause.

Retained Experts

Plaintiff-specific reports

1. Dr. Henry A. Anderson
2. Frank M. Parker III - CIH

General reports:

- a. Dr. Henry A. Anderson report re: Roddis/Weyerhaeuser Marshfield door plant mesothelioma and lung cancer cases (January 30, 2015.)
- b. Dr. Arnold R. Brody Report re: Asbestos Induced Lung Disease (Oct. 14, 2011)
- c. Frank M. Parker III report re: Asbestos - Worker, Community, and Household Exposures Roddis Plywood Co. / Weyerhaeuser Co. Fire Door Manufacturing Operations Marshfield, WI (January, 2015)

Non-retained experts

The following witnesses are expected to testify about:

- medical care and treatment of the injured party, including without limitation, matters expressed in medical records,
- the pre-existing health of the injured party before the alleged asbestos related condition (including whether any pre-existing condition is life threatening or shortening),
- future medical care and treatment needed,
- whether the condition at issue is related to exposure to asbestos (if any opinion on this).

Summary of the facts and opinions on which the witnesses are expected to testify: The witnesses are expected to testify to treatment as disclosed in the medical records and to opinions formed in the course of the treatment he provided, and future medical care and treatment reasonably expected to be needed.

Non-retained experts

- 1a. Oncologist: Dr. Elena Theodosiou
Portsmouth Hematology and Oncology Center
155 Borthick Ave. Ste. 301
Portsmouth, NH
(603) 294-1231
- 1b. General Physician: Dr. Thomas Stoffel
Edgar Clinic
103 South 3rd. Ave.
(715) 352-2333
- 1c. Pulmonologist: Dr. John D. Crump
Marshfield Clinic
1000 N. Oak Ave.
Marshfield, WI 54449
(715) 358-1888

Dated: January 30, 2015

Respectfully submitted,

/s/ Robert G. McCoy

Robert G. McCoy

Attorney for Plaintiff

Cascino Vaughan Law Offices, Ltd.

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